Ex 14 B

### UNITED STATES DISTRICT COURT

#### DISTRICT OF NEW HAMPSHIRE

VS

NO: 1:11-CV-421-PB

## DEPOSITION OF PAMELA KOZLOWSKI

#### VOLUME II

This deposition taken by agreement of counsel at the Office of the Attorney General, 33 Capitol Street, Concord, New Hampshire, on Friday, October 26, 2012, commencing at 1:53 P.M.

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1
         her concerns with respect to Lisa?
  2
                   MS. DEMPSEY: Objection as to form.
  3
         You can answer.
  4
         You mean to everybody?
  5
         Well, to you, to Paula?
  6
                   MS. DEMPSEY: Objection as to form.
 7
         Is it fair to say that Michele was trying to
         get help from the court system in the August
 8
 9
         12th to August 19th time period with respect
10
         to her concerns about Lisa?
11 A
        Yes, certainly on the August 13th occurrence
12
        of events.
13 Q
        I think we talked a little earlier, Michele
        often had concerns that she expressed to you
14
15
        about family division, correct?
16 A
        Yes.
17
        And it is fair to say you kind of tuned her
        out during a lot of those conversations with
18
        respect to her complaints, correct?
19
20
                  MS. DEMPSEY: Objection as to form.
21
        You can answer.
22 A
        Yes.
23
        So you don't really, today, have a
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PAMELA KOZLOWSKI October 26, 2012

1 Q Right. 2 A No. I don't think so. I did not take her telling me the things as if she were reporting the things as if she were reporting sexual harassment to you, then your responsibility would be to what? 3 A To make a report. 4 A To make a report. 5 Q Okay. If she were reporting sexual harassment to what? 5 A To make a report. 6 A You are that this policy on the top of poge of 2 And who do you report to? 10 A Via this process, there is a process in place that usually goes to either Don Goodnow or an assignee of Don Goodnow, to commence the linestigation. 14 Q And he is at ACC, correct? 15 A He is the director of the AOC. 16 Q You agree that this policy on the top of page of a green to you, and they ask you not to report it up, you sist to you, and they ask you not to report it up, you so this policy while I have to report it above you? 21 A Yes. 22 Q Thank you. I will have you take a look at this policy on the top of policy, for Identification.) 23 Thank you. I will have you take a look at this policy on the top of policy, for Identification.) 24 Q What is 16? 25 A I tooks like it is - I can't think of the word. 26 Tatemization policy? 27 A Yes, thank you. 28 A Yes, thank you. 39 A Yes, thank you. 39 A No. I don't think of the word. 30 Policy, vou have seen in place — strike that. That is a bad question. 30 This looks like a policy that was in place as of at least March 16, 2007, according to the date on the signature? 30 A I am not sure if it possibly changed, because 31 A I am not sure if it possibly changed, because 32 A I am not sure if it possibly changed, because 32 This fixed there are reporter with the court? 34 A I am not sure if it possibly changed, because 35 A I am not sure if it possibly changed, because		10001 2012					
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them to me.  Qokay. If she were reporting sexual harassment to you, then your responsibility would be to what?  A To make a report.  A A Wes.  A A To make a report.  A A Wes ill is the same policy.  Are you familiar with Judicial Branch Personnel Rule 27 which was the 20 Brown, exhibit?  A Yes.  Let me ask a different uestion because that is unclear.  Is that rule covered in the scope of rules that should be reported if violated to persons such a previour should report to one of the reporters listed along with the RCAs?  Let me ask a different uestion because that is unclear.  A S. DEMPSEY: Objection as to form.  You can answer.  If I was an administrator, and I had a clerk come to me with an employee that fell under this, it would become a disciplinary action, and I would be reported if violated to persons such a stalking netting how the reporter in the scope of rules that should be reported if violated to persons such a disciplinary action, and I would be reported if violated to persons such a stalking reporter.  It				telling me the things are is			
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# PAMELA KOZLOWSKI October 26, 2012

	•		Page 112
1		You can answer.	
2	A	Yes.	
3	Q	You are aware that one of the allegations we	
4		just went over is that Michele that	
5		co-workers invited her to join in a lesbian	
6		sexual relationship?	
7	A	Yes, that is one of the ones we just read.	
8	Q	And we agreed that that was inappropriate, if	
9		it occurred?	
10	A	Yes.	
11	Q	And when you were interviewed by Ms. Howe	
12		talked to, however we want to say it, did she	
13		raise her voice to you?	
14	A	Ms. Howe?	
15	Q 2	Ms. Howe?	
16	A	No, not that I recall.	
17	Q	Was she pleasant to you?	
18	A	I recall it being a pleasant interview,	
19		conversation, yes.	
20	Q	Did you understand whether she was an	
21		independent investigator?	
22	A	I think I understood her role as being engaged	
23		by the administrative office of the courts for	